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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LATESHA WATSON,

Plaintiff

v.

CITY OF HENDERSON et al.,

Defendants

Case No.: 2:20-cv-01761-APG-BNW

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO RESPOND TO
PLAINTIFF’S MOTION FOR
RECONSIDERATION AND FIRST
AMENDED COMPLAINT**

(FIRST REQUEST)

Plaintiff Latesha Watson (“Plaintiff”) and Defendants City of Henderson, Richard Derrick, Bristol Ellington, Nicholas Vaskov, Kristina Escamilla Gilmore, Kevin Abernathy, Kenneth Kerby, Richard McCann (“Defendants”) (collectively, the “Parties”), through their undersigned counsel, for good cause shown, hereby stipulate to extend Defendants’ deadline to respond to Plaintiff’s Motion for Reconsideration (the “Motion”) [ECF No. 92] to December 3, 2021, Plaintiff’s reply to December 20, 2021 and to extend Defendants’ deadline to respond to Plaintiff’s First Amended Complaint to January 14, 2022 for the following reasons:

1 1. On September 23, 2021, this Court granted Defendants' motion to dismiss in part
2 and gave Plaintiff leave to amend her complaint by October 15, 2021, which this Court later
3 extended to November 1, 2021.

4 2. After this Court granted the motion, Magistrate Judge Brenda Weksler lifted the
5 temporary stay on discovery and ordered the parties to meet and confer to file a joint proposed
6 discovery plan and scheduling order.

7 3. On October 19, 2021, the magistrate judge granted the amended joint discovery plan
8 and scheduling order.

9 4. Plaintiff filed her motion for reconsideration and an amended complaint on
10 November 1, 2021, triggering a deadline for the Defendants to respond to both the Motion and the
11 amended complaint on November 15, 2021.

12 5. Counsel requires additional time to prepare the appropriate responses to the Motion
13 and to the amended complaint given the number of defendants, discovery deadlines, the nature of
14 the dispute, and the upcoming holidays.

15 6. The Parties agreed to the extensions requested herein.

16 7. This extension request is sought in good faith and is not made for the purpose of
17 delay.

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Therefore, the Parties respectfully request an extension for Defendants to respond to Plaintiff's Motion for Reconsideration up to and including December 3, 2021, with Plaintiff's reply due on or before December 20, 2021. The Parties also respectfully request an extension for Defendants to respond to Plaintiff's amended complaint up to and including January 14, 2022.

DATED this 11th day of November 2021.

SNELL & WILMER L.L.P.

/s/

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DATED this 11th day of November 2021.

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DATED this 11th day of November 2021.

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Attorneys for Plaintiff Latesha Watson

IT IS SO ORDERED.

DATED: November 12, 2021.


UNITED STATES DISTRICT COURT JUDGE